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APR 30 2019	
CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
BY  M. DEPUTY	

# SEALED

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

1. Jose Rodrigo Felix-Quiroz,  
(Counts 1-63)
2. Sergio Felix Esparza, Jr.,  
(Counts 1-30, 61-63)
3. Rafael Palomares, Jr.,  
(Counts 1, 31, 48-59, 63)
4. Rodrigo Samayoa-Villareal,  
(Counts 1, 32-44, 63)
5. Alejandro Jimenez Gastelum,  
(Counts 1, 45-47)
6. Daniel Langstaff Mirazo,  
(Counts 1, 48-54, 63)
7. Moises Guadalupe Garcia, Jr.,  
(Counts 1, 55-56, 63)
8. Jesus Sanchez Vega,  
(Counts 1, 57, 63)
9. Maila Margarita Lerma,  
(Counts 1, 58-59, 63)

Defendants.

CR-19-00089-PHX-JJT

**SUPERSEDING INDICTMENT**

VIO: 18 U.S.C. § 371  
(Conspiracy)  
Count 1

18 U.S.C. § 924(a)(1)(A)  
(False Statement During Purchase of  
a Firearm)  
Counts 2-59

18 U.S.C. § 922(g)(5)(B)  
(Possession of Ammunition by  
Nonimmigrant Alien)  
Count 60

22 C.F.R. § 127.1(a)(1) and 22  
U.S.C. § 2778(c)  
(Export of Defense Articles without  
a License)  
Counts 61-62

22 C.F.R. § 127.1(a)(4) and 22  
U.S.C. § 2778(c)  
(Conspiracy to Export Defense  
Articles without a License)  
Count 63

18 U.S.C. §§ 924(d) and 981,  
21 U.S.C. § 853, and  
28 U.S.C. § 2461(c)  
(Forfeiture Allegation)

THE GRAND JURY CHARGES:

**COUNT 1****Conspiracy  
(18 U.S.C. § 371)**

1  
2  
3  
4 1. Beginning at a time unknown, but no later than May 2018, and continuing  
5 through December 2018, in the District of Arizona and elsewhere, JOSE RODRIGO  
6 FELIX-QUIROZ, SERGIO FELIX ESPARZA, JR., RAFAEL PALOMARES, JR.,  
7 RODRIGO SAMAYOA-VILLAREAL, ALEJANDRO JIMENEZ GASTELUM,  
8 DANIEL LANGSTAFF MIRAZO, MOISES GUADALUPE GARCIA, JR., JESUS  
9 SANCHEZ VEGA, and MAILA MARGARITA LERMA, and others known and unknown  
10 to the Grand Jury, unlawfully, willfully, and knowingly agreed, combined, and conspired  
11 with each other, and others, to commit the following offense against the United States:  
12 False Statement During the Purchase of a Firearm, in violation of 18 U.S.C. § 924(a)(1)(A).

**MANNER AND MEANS OF THE CONSPIRACY AND SCHEME**

13  
14 2. JOSE RODRIGO FELIX-QUIROZ, a citizen and resident of Mexico,  
15 recruited SERGIO FELIX ESPARZA, JR., RAFAEL PALOMARES, JR., RODRIGO  
16 SAMAYOA-VILLAREAL, and ALEJANDRO JIMENEZ GASTELUM to purchase  
17 firearms for him in Arizona. At FELIX-QUIROZ's direction and on his behalf,  
18 ESPARZA, PALOMARES, SAMAYOA-VILLAREAL, and JIMENEZ GASTELUM  
19 purchased firearms for FELIX-QUIROZ from federal firearms licensees ("FFLs") in  
20 Arizona. Each time they purchased a firearm on FELIX-QUIROZ's behalf, ESPARZA,  
21 PALOMARES, SAMAYOA-VILLAREAL, and JIMENEZ GASTELUM completed a  
22 Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473,  
23 Firearms Transaction Record ("Form 4473") on which they falsely represented that they  
24 were the actual transferee and buyer of the firearms. ESPARZA and SAMAYOA-  
25 VILLAREAL also falsely represented on their Forms 4473 that they resided at addresses  
26 in Yuma, Arizona, when in fact they both resided in Mexico. After purchasing the firearms,  
27 ESPARZA, PALOMARES, SAMAYOA-VILLAREAL, and JIMENEZ GASTELUM  
28 gave the firearms to FELIX-QUIROZ, who then transported them to Mexico for resale.

1 FELIX-QUIROZ paid ESPARZA, PALOMARES, SAMAYOA-VILLAREAL, and  
2 JIMENEZ GASTELUM for purchasing the firearms on his behalf.

3 3. In addition to purchasing firearms for FELIX-QUIROZ, PALOMARES also  
4 recruited DANIEL LANGSTAFF MIRAZO, MOISES GUADALUPE GARCIA, JR.,  
5 JESUS SANCHEZ VEGA, and MAILA MARGARITA LERMA to purchase firearms for  
6 FELIX-QUIROZ. At FELIX-QUIROZ's or PALOMARES's direction, and on FELIX-  
7 QUIROZ's behalf, MIRAZO, GARCIA, SANCHEZ VEGA, and LERMA purchased  
8 firearms for FELIX-QUIROZ from FFLs in Arizona. Each time they purchased a firearm  
9 at FELIX-QUIROZ's or PALOMARES's direction, MIRAZO, GARCIA, SANCHEZ  
10 VEGA, and LERMA completed a Form 4473 on which they falsely represented that they  
11 were the actual transferee and buyer of the firearms. After purchasing the firearms,  
12 MIRAZO, GARCIA, SANCHEZ VEGA, and LERMA gave the firearms to FELIX-  
13 QUIROZ or to PALOMARES, who gave them to FELIX-QUIROZ. FELIX-QUIROZ  
14 then transported the firearms to Mexico for resale. FELIX-QUIROZ or PALOMARES  
15 paid MIRAZO, GARCIA, SANCHEZ VEGA, and LERMA for purchasing the firearms on  
16 FELIX-QUIROZ's behalf.

#### 17 OVERT ACTS

18 4. In furtherance of the conspiracy, and to achieve the objects of the conspiracy,  
19 overt acts were committed including the following:

20 A. On or about May 24, 2018, MIRAZO purchased two Glock pistols from  
21 Sprague's Sports, an FFL in Yuma, Arizona. To obtain the firearms,  
22 MIRAZO completed a Form 4473 in which he falsely represented that he  
23 was the actual transferee and buyer of the firearms listed on the form, when  
24 in fact, he purchased the firearms at FELIX-QUIROZ's or PALOMARES's  
25 direction and on FELIX-QUIROZ's behalf.

26 B. On or about June 13, 2018, SAMAYOA-VILLAREAL initiated the purchase  
27 a Glock pistol from Jones & Jones, an FFL in Somerton, Arizona. To obtain  
28

1 the firearm, SAMAYOA-VILLAREAL completed a Form 4473 in which he  
2 falsely represented that he was the actual transferee and buyer of the firearm  
3 listed on the form, when in fact, he was purchasing the firearm on FELIX-  
4 QUIROZ's behalf.

5 C. On or about June 16, 2018, SAMAYOA-VILLAREAL completed the  
6 purchase, initiated June 13, 2018, of a Glock pistol from Jones & Jones, an  
7 FFL in Somerton, Arizona. To obtain the firearm, SAMAYOA-  
8 VILLAREAL recertified that the information previously provided on the  
9 Form 4473, including his representation that he was the actual transferee and  
10 buyer of the firearm listed on the form, remained true, when in fact, he  
11 purchased the firearm on FELIX-QUIROZ's behalf.

12 D. On or about July 10, 2018, ESPARZA purchased a Glock pistol from C-A-L  
13 Ranch Stores, an FFL in Yuma, Arizona. To obtain the firearm, ESPARZA  
14 completed a Form 4473 in which he falsely represented that he was the actual  
15 transferee and buyer of the firearm listed on the form, when in fact, he  
16 purchased the firearm on FELIX-QUIROZ's behalf.

17 E. On or about July 13, 2018, ESPARZA purchased a Glock pistol from Jones  
18 & Jones, an FFL in Somerton, Arizona. To obtain the firearm, ESPARZA  
19 completed a Form 4473 in which he falsely represented that he was the actual  
20 transferee and buyer of the firearm listed on the form, when in fact, he  
21 purchased the firearm on FELIX-QUIROZ's behalf.

22 F. On or about July 17, 2018, ESPARZA purchased a Colt pistol from Jones &  
23 Jones, an FFL in Somerton, Arizona. To obtain the firearm, ESPARZA  
24 completed a Form 4473 in which he falsely represented that he was the actual  
25 transferee and buyer of the firearm listed on the form, when in fact, he  
26 purchased the firearm on FELIX-QUIROZ's behalf.

27 G. On or about July 27, 2018, MIRAZO purchased a Century Arms rifle from  
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1 Sprague's Sports, an FFL in Yuma, Arizona. To obtain the firearm,  
2 MIRAZO completed a Form 4473 in which he falsely represented that he  
3 was the actual transferee and buyer of the firearm listed on the form, when  
4 in fact, he purchased the firearm at FELIX-QUIROZ's or PALOMARES's  
5 direction and on FELIX-QUIROZ's behalf.

6 H. On or about July 31, 2018, ESPARZA purchased a Glock pistol from Jones  
7 & Jones, an FFL in Somerton, Arizona. To obtain the firearm, ESPARZA  
8 completed a Form 4473 in which he falsely represented that he was the actual  
9 transferee and buyer of the firearm listed on the form, when in fact, he  
10 purchased the firearm on FELIX-QUIROZ's behalf.

11 I. On or about August 1, 2018, MIRAZO purchased a Glock pistol from Jones  
12 & Jones, an FFL in Somerton, Arizona. To obtain the firearm, MIRAZO  
13 completed a Form 4473 in which he falsely represented that he was the actual  
14 transferee and buyer of the firearm listed on the form, when in fact, he  
15 purchased the firearm at FELIX-QUIROZ's or PALOMARES's direction  
16 and on FELIX-QUIROZ's behalf.

17 J. On or about August 3, 2018, MIRAZO purchased a Colt rifle from Jones &  
18 Jones, an FFL in Somerton, Arizona. To obtain the firearm, MIRAZO  
19 completed a Form 4473 in which he falsely represented that he was the actual  
20 transferee and buyer of the firearm listed on the form, when in fact, he  
21 purchased the firearm at FELIX-QUIROZ's or PALOMARES's direction  
22 and on FELIX-QUIROZ's behalf.

23 K. On or about August 8, 2018, SAMAYOA-VILLAREAL purchased a Glock  
24 pistol from C-A-L Ranch Stores, an FFL in Yuma, Arizona. To obtain the  
25 firearm, SAMAYOA-VILLAREAL completed a Form 4473 in which he  
26 falsely represented that he was the actual transferee and buyer of the firearm  
27 listed on the form, when in fact, he purchased the firearm on FELIX-  
28



1 QUIROZ's behalf.

2 L. On or about August 9, 2018, ESPARZA purchased a Colt rifle from Jones &  
3 Jones, an FFL in Somerton, Arizona. To obtain the firearm, ESPARZA  
4 completed a Form 4473 in which he falsely represented that he was the actual  
5 transferee and buyer of the firearm listed on the form, when in fact, he  
6 purchased the firearm on FELIX-QUIROZ's behalf.

7 M. On or about August 11, 2018, ESPARZA purchased a Colt rifle from Jones  
8 & Jones, an FFL in Somerton, Arizona. To obtain the firearm, ESPARZA  
9 completed a Form 4473 in which he falsely represented that he was the actual  
10 transferee and buyer of the firearm listed on the form, when in fact, he  
11 purchased the firearm on FELIX-QUIROZ's behalf.

12 N. On or about August 16, 2018, SAMAYOA-VILLAREAL initiated the  
13 purchase of a Glock pistol from Jones & Jones, an FFL in Somerton, Arizona.  
14 To obtain the firearm, SAMAYOA-VILLAREAL completed a Form 4473 in  
15 which he falsely represented that he was the actual transferee and buyer of  
16 the firearm listed on the form, when in fact, he was purchasing the firearm  
17 on FELIX-QUIROZ's behalf.

18 O. On or about August 18, 2018, ESPARZA purchased a Glock pistol from  
19 Jones & Jones, an FFL in Somerton, Arizona. To obtain the firearm,  
20 ESPARZA completed a Form 4473 in which he falsely represented that he  
21 was the actual transferee and buyer of the firearm listed on the form, when  
22 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

23 P. On or about August 21, 2018, SAMAYOA-VILLAREAL initiated the  
24 purchase of a Glock pistol from C-A-L Ranch Stores, an FFL in Yuma,  
25 Arizona. To obtain the firearm, SAMAYOA-VILLAREAL completed a  
26 Form 4473 in which he falsely represented that he was the actual transferee  
27 and buyer of the firearm listed on the form, when in fact, he was purchasing  
28

1 the firearm on FELIX-QUIROZ's behalf.

2 Q. On or about August 22, 2018, SAMAYOA-VILLAREAL completed the  
3 purchase, initiated August 21, 2018, of a Glock pistol from C-A-L Ranch  
4 Stores, an FFL in Yuma, Arizona. To obtain the firearm, SAMAYOA-  
5 VILLAREAL recertified that the information previously provided on the  
6 Form 4473, including his representation that he was the actual transferee and  
7 buyer of the firearm listed on the form, remained true, when in fact, he  
8 purchased the firearm on FELIX-QUIROZ's behalf.

9 R. On or about August 23, 2018, SAMAYOA-VILLAREAL completed the  
10 purchase, initiated August 16, 2018, of a Glock pistol from Jones & Jones,  
11 an FFL in Somerton, Arizona. To obtain the firearm, SAMAYOA-  
12 VILLAREAL recertified that the information previously provided on the  
13 Form 4473, including his representation that he was the actual transferee and  
14 buyer of the firearm listed on the form, remained true, when in fact, he was  
15 purchased the firearm on FELIX-QUIROZ's behalf.

16 S. On or about August 24, 2018, ESPARZA purchased a Colt rifle from Jones  
17 & Jones, an FFL in Somerton, Arizona. To obtain the firearm, ESPARZA  
18 completed a Form 4473 in which he falsely represented that he was the actual  
19 transferee and buyer of the firearm listed on the form, when in fact, he  
20 purchased the firearm on FELIX-QUIROZ's behalf.

21 T. On or about August 27, 2018, ESPARZA purchased a Colt rifle from Jones  
22 & Jones, an FFL in Somerton, Arizona. To obtain the firearm, ESPARZA  
23 completed a Form 4473 in which he falsely represented that he was the actual  
24 transferee and buyer of the firearm listed on the form, when in fact, he  
25 purchased the firearm on FELIX-QUIROZ's behalf.

26 U. On or about August 29, 2018, SAMAYOA-VILLAREAL purchased a Colt  
27 rifle from Jones & Jones, an FFL in Somerton, Arizona. To obtain the  
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1 firearm, SAMAYOA-VILLAREAL completed a Form 4473 in which he  
2 falsely represented that he was the actual transferee and buyer of the firearm  
3 listed on the form, when in fact, he purchased the firearm on FELIX-  
4 QUIROZ's behalf.

5 V. On or about August 30, 2018, ESPARZA purchased a Glock pistol from  
6 Jones & Jones, an FFL in Somerton, Arizona. To obtain the firearm,  
7 ESPARZA completed a Form 4473 in which he falsely represented that he  
8 was the actual transferee and buyer of the firearm listed on the form, when  
9 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

10 W. On or about August 31, 2018, MIRAZO purchased an IWI rifle from  
11 Sprague's Sports, an FFL in Yuma, Arizona. To obtain the firearm,  
12 MIRAZO completed a Form 4473 in which he falsely represented that he  
13 was the actual transferee and buyer of the firearm listed on the form, when  
14 in fact, he purchased the firearm at FELIX-QUIROZ's or PALOMARES's  
15 direction and on FELIX-QUIROZ's behalf.

16 X. On or about September 5, 2018, ESPARZA purchased a Glock pistol from  
17 C-A-L Ranch Stores, an FFL in Yuma, Arizona. To obtain the firearm,  
18 ESPARZA completed a Form 4473 in which he falsely represented that he  
19 was the actual transferee and buyer of the firearm listed on the form, when  
20 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

21 Y. On or about September 8, 2018, SAMAYOA-VILLAREAL purchased a  
22 Glock pistol from C-A-L Ranch Stores, an FFL in Yuma, Arizona. To obtain  
23 the firearm, SAMAYOA-VILLAREAL completed a Form 4473 in which he  
24 falsely represented that he was the actual transferee and buyer of the firearm  
25 listed on the form, when in fact, he purchased the firearm on FELIX-  
26 QUIROZ's behalf.

27 Z. On or about September 11, 2018, ESPARZA purchased a Glock pistol from  
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1 Jones & Jones, an FFL in Somerton, Arizona. To obtain the firearm,  
2 ESPARZA completed a Form 4473 in which he falsely represented that he  
3 was the actual transferee and buyer of the firearm listed on the form, when  
4 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

5 AA. On or about September 12, 2018, SAMAYOA-VILLAREAL purchased a  
6 Glock pistol from Jones & Jones, an FFL in Somerton, Arizona. To obtain  
7 the firearm, SAMAYOA-VILLAREAL completed a Form 4473 in which he  
8 falsely represented that he was the actual transferee and buyer of the firearm  
9 listed on the form, when in fact, he purchased the firearm on FELIX-  
10 QUIROZ's behalf.

11 BB. On or about September 13, 2018, ESPARZA purchased an IWI rifle from  
12 Jones & Jones, an FFL in Somerton, Arizona. To obtain the firearm,  
13 ESPARZA completed a Form 4473 in which he falsely represented that he  
14 was the actual transferee and buyer of the firearm listed on the form, when  
15 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

16 CC. On or about September 13, 2018, ESPARZA purchased a Glock pistol from  
17 C-A-L Ranch Stores, an FFL in Yuma, Arizona. To obtain the firearm,  
18 ESPARZA completed a Form 4473 in which he falsely represented that he  
19 was the actual transferee and buyer of the firearm listed on the form, when  
20 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

21 DD. On or about September 18, 2018, SAMAYOA-VILLAREAL purchased a  
22 Glock pistol from Jones & Jones, an FFL in Somerton, Arizona. To obtain  
23 the firearm, SAMAYOA-VILLAREAL completed a Form 4473 in which he  
24 falsely represented that he was the actual transferee and buyer of the firearm  
25 listed on the form, when in fact, he purchased the firearm on FELIX-  
26 QUIROZ's behalf.

27 EE. On or about September 22, 2018, MIRAZO purchased a Barrett rifle from  
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1 Sprague's Sports, an FFL in Yuma, Arizona. To obtain the firearm,  
2 MIRAZO completed a Form 4473 in which he falsely represented that he  
3 was the actual transferee and buyer of the firearm listed on the form, when  
4 in fact, he purchased the firearm at FELIX-QUIROZ's or PALOMARES's  
5 direction and on FELIX-QUIROZ's behalf.

6 FF. On or about September 28, 2018, ESPARZA purchased a Colt pistol from  
7 Jones & Jones, an FFL in Somerton, Arizona. To obtain the firearm,  
8 ESPARZA completed a Form 4473 in which he falsely represented that he  
9 was the actual transferee and buyer of the firearm listed on the form, when  
10 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

11 GG. On or about October 3, 2018, MIRAZO purchased an Inland rifle from  
12 Sprague's Sports, an FFL in Yuma, Arizona. To obtain the firearm,  
13 MIRAZO completed a Form 4473 in which he falsely represented that he  
14 was the actual transferee and buyer of the firearm listed on the form, when  
15 in fact, he purchased the firearm at FELIX-QUIROZ's or PALOMARES's  
16 direction and on FELIX-QUIROZ's behalf.

17 HH. On or about October 5, 2018, ESPARZA purchased a Springfield pistol from  
18 SuperPawn, an FFL in Yuma, Arizona. To obtain the firearm, ESPARZA  
19 completed a Form 4473 in which he falsely represented that he was the actual  
20 transferee and buyer of the firearm listed on the form, when in fact, he  
21 purchased the firearm on FELIX-QUIROZ's behalf.

22 II. On or about October 5, 2018, FELIX-QUIROZ accompanied ESPARZA to  
23 SuperPawn. After ESPARZA purchased a firearm, FELIX-QUIROZ and  
24 ESPARZA left together in FELIX-QUIROZ's vehicle.

25 JJ. On or about October 22, 2018, ESPARZA purchased a Colt pistol from Jones  
26 & Jones, an FFL in Somerton, Arizona. To obtain the firearm, ESPARZA  
27 completed a Form 4473 in which he falsely represented that he was the actual  
28

1 transferee and buyer of the firearm listed on the form, when in fact, he  
2 purchased the firearm on FELIX-QUIROZ's behalf.

3 KK. On or about October 24, 2018, ESPARZA purchased a Glock pistol from  
4 C-A-L Ranch Stores, an FFL in Yuma, Arizona. To obtain the firearm,  
5 ESPARZA completed a Form 4473 in which he falsely represented that he  
6 was the actual transferee and buyer of the firearm listed on the form, when  
7 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

8 LL. On or about October 25, 2018, ESPARZA purchased a Glock pistol from  
9 Jones & Jones, an FFL in Somerton, Arizona. To obtain the firearm,  
10 ESPARZA completed a Form 4473 in which he falsely represented that he  
11 was the actual transferee and buyer of the firearm listed on the form, when  
12 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

13 MM. On or about October 25, 2018, SAMAYOA-VILLAREAL purchased a  
14 Glock pistol from Jones & Jones, an FFL in Somerton, Arizona. To obtain  
15 the firearm, SAMAYOA-VILLAREAL completed a Form 4473 in which he  
16 falsely represented that he was the actual transferee and buyer of the firearm  
17 listed on the form, when in fact, he purchased the firearm on FELIX-  
18 QUIROZ's behalf.

19 NN. On or about October 30, 2018, ESPARZA purchased a Glock pistol from  
20 C-A-L Ranch Stores, an FFL in Yuma, Arizona. To obtain the firearm,  
21 ESPARZA completed a Form 4473 in which he falsely represented that he  
22 was the actual transferee and buyer of the firearm listed on the form, when  
23 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

24 OO. On or about October 30, 2018, SAMAYOA-VILLAREAL purchased a  
25 Glock pistol from C-A-L Ranch Stores, an FFL in Yuma, Arizona. To obtain  
26 the firearm, SAMAYOA-VILLAREAL completed a Form 4473 in which he  
27 falsely represented that he was the actual transferee and buyer of the firearm  
28

1 listed on the form, when in fact, he purchased the firearm on FELIX-  
2 QUIROZ's behalf.

3 PP. On or about November 1, 2018, ESPARZA purchased a Colt pistol from  
4 Jones & Jones, an FFL in Somerton, Arizona. To obtain the firearm,  
5 ESPARZA completed a Form 4473 in which he falsely represented that he  
6 was the actual transferee and buyer of the firearm listed on the form, when  
7 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

8 QQ. On or about November 2, 2018, GARCIA purchased a Century Arms pistol  
9 from Jones & Jones, an FFL in Somerton, Arizona. To obtain the firearm,  
10 GARCIA completed a Form 4473 in which he falsely represented that he was  
11 the actual transferee and buyer of the firearm listed on the form, when in fact,  
12 he purchased the firearm at FELIX-QUIROZ's or PALOMARES's direction  
13 and on FELIX-QUIROZ's behalf.

14 RR. On or about November 3, 2018, ESPARZA purchased a Colt rifle from Jones  
15 & Jones, an FFL in Somerton, Arizona. To obtain the firearm, ESPARZA  
16 completed a Form 4473 in which he falsely represented that he was the actual  
17 transferee and buyer of the firearm listed on the form, when in fact, he  
18 purchased the firearm on FELIX-QUIROZ's behalf.

19 SS. On or about November 5, 2018, JIMENEZ GASTELUM purchased a Glock  
20 pistol from C-A-L Ranch Stores, an FFL in Yuma, Arizona. To obtain the  
21 firearm, JIMENEZ GASTELUM completed a Form 4473 in which he falsely  
22 represented that he was the actual transferee and buyer of the firearm listed  
23 on the form, when in fact, he purchased the firearm on FELIX-QUIROZ's  
24 behalf.

25 TT. On or about November 7, 2018, SAMAYOA-VILLAREAL purchased a  
26 Glock pistol from Jones & Jones, an FFL in Somerton, Arizona. To obtain  
27 the firearm, SAMAYOA-VILLAREAL completed a Form 4473 in which he  
28

1           falsely represented that he was the actual transferee and buyer of the firearm  
2           listed on the form, when in fact, he purchased the firearm on FELIX-  
3           QUIROZ's behalf.

4           UU. On or about November 10, 2018, ESPARZA purchased a Smith & Wesson  
5           pistol from SuperPawn, an FFL in Yuma, Arizona. To obtain the firearm,  
6           ESPARZA completed a Form 4473 in which he falsely represented that he  
7           was the actual transferee and buyer of the firearm listed on the form, when  
8           in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

9           VV. On or about November 10, 2018, FELIX-QUIROZ accompanied ESPARZA  
10          to SuperPawn. After ESPARZA purchased a firearm, FELIX-QUIROZ and  
11          ESPARZA left together in FELIX-QUIROZ's vehicle.

12          WW. On or about November 10, 2018, ESPARZA purchased a Colt rifle from  
13          Jones & Jones, an FFL in Somerton, Arizona. To obtain the firearm,  
14          ESPARZA completed a Form 4473 in which he falsely represented that he  
15          was the actual transferee and buyer of the firearm listed on the form, when  
16          in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

17          XX. On or about November 10, 2018, PALOMARES, GARCIA, SANCHEZ  
18          VEGA, and LERMA traveled together from Yuma, Arizona, to Elite  
19          Ordinance Manufacturers, an FFL in Phoenix, Arizona, for the purpose of  
20          purchasing a firearm at PALOMARES's direction and on FELIX-QUIROZ's  
21          behalf.

22          YY. On or about November 10, 2018, LERMA initiated the purchase of a Barrett  
23          rifle from Elite Ordinance Manufacturers. To obtain the firearm, LERMA  
24          completed a Form 4473 in which she falsely represented that she was the  
25          actual transferee and buyer of the firearm listed on the form, when in fact,  
26          she was attempting to purchase the firearm at PALOMARES's direction and  
27          on FELIX-QUIROZ's behalf.



1 ZZ. On or about November 13, 2018, ESPARZA purchased a Glock pistol from  
2 C-A-L Ranch Stores, an FFL in Yuma, Arizona. To obtain the firearm,  
3 ESPARZA completed a Form 4473 in which he falsely represented that he  
4 was the actual transferee and buyer of the firearm listed on the form, when  
5 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

6 AAA. On or about November 13, 2018, shortly after ESPARZA purchased a  
7 firearm from C-A-L Ranch Stores, FELIX-QUIROZ arrived at the store in  
8 his vehicle and picked up ESPARZA.

9 BBB. On or about November 16, 2018, SAMAYOA-VILLAREAL purchased a  
10 Colt pistol from Jones & Jones, an FFL in Somerton, Arizona. To obtain the  
11 firearm, SAMAYOA-VILLAREAL completed a Form 4473 in which he  
12 falsely represented that he was the actual transferee and buyer of the firearm  
13 listed on the form, when in fact, he purchased the firearm on FELIX-  
14 QUIROZ's behalf.

15 CCC. On or about November 21, 2018, ESPARZA purchased a Glock pistol from  
16 Jones & Jones, an FFL in Somerton, Arizona. To obtain the firearm,  
17 ESPARZA completed a Form 4473 in which he falsely represented that he  
18 was the actual transferee and buyer of the firearm listed on the form, when  
19 in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

20 DDD. On November 23, 2018, PALOMARES purchased an FN rifle from  
21 Sprague's Sports, LLC, a FFL in Yuma, Arizona. To obtain the firearm,  
22 PALOMARES completed a Form 4473 in which he falsely represented that  
23 he was the actual buyer of the firearm listed on the form when, in fact, he  
24 purchased the firearm on FELIX-QUIROZ's behalf.

25 EEE. On or about November 27, 2018, SANCHEZ VEGA initiated the purchase  
26 of an FN rifle from Sprague's Sports, LLC, a FFL in Yuma, Arizona. To  
27 obtain the firearm, SANCHEZ VEGA completed a Form 4473 in which he  
28

1           falsely represented that he was the actual transferee and buyer of the firearm,  
2           when in fact, he was purchasing the firearm at the direction of PALOMARES  
3           and on behalf of FELIX-QUIROZ.

4           FFF. On or about November 29, 2018, SANCHEZ VEGA completed the purchase,  
5           initiated on November 27, 2018, of an FN rifle from Sprague's Sports, LLC.  
6           To obtain the firearm, SANCHEZ VEGA recertified that the information  
7           previously provided on the Form 4473, including his representation that he  
8           was the actual transferee and buyer of the firearm listed on the form,  
9           remained true, when in fact, he was purchased the firearm at the direction of  
10          PALOMARES and on behalf of FELIX-QUIROZ.

11          GGG. On or about November 30, 2018, ESPARZA purchased a Colt pistol from  
12          Jones & Jones, an FFL in Somerton, Arizona. To obtain the firearm,  
13          ESPARZA completed a Form 4473 in which he falsely represented that he  
14          was the actual transferee and buyer of the firearm listed on the form, when  
15          in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

16          HHH. On or about November 30, 2018, JIMENEZ GASTELUM purchased a Colt  
17          rifle from Jones & Jones, an FFL in Somerton, Arizona 85350. To obtain the  
18          firearm, JIMENEZ GASTELUM completed a Form 4473 in which he falsely  
19          represented that he was the actual transferee and buyer of the firearm listed  
20          on the form, when in fact, he purchased the firearm on FELIX-QUIROZ's  
21          behalf.

22          III. On or about December 4, 2018, SAMAYOA-VILLAREAL purchased a  
23          Glock pistol from C-A-L Ranch Stores, an FFL in Yuma, Arizona. To obtain  
24          the firearm, SAMAYOA-VILLAREAL completed a Form 4473 in which he  
25          falsely represented that he was the actual transferee and buyer of the firearm  
26          listed on the form, when in fact, he purchased the firearm on FELIX-  
27          QUIROZ's behalf.

1           JJJ. On or about December 4, 2018, JIMENEZ GASTELUM purchased a Colt  
2           pistol from Jones & Jones, an FFL in Somerton, Arizona. To obtain the  
3           firearm, JIMENEZ GASTELUM completed a Form 4473 in which he falsely  
4           represented that he was the actual transferee and buyer of the firearm listed  
5           on the form, when in fact, he purchased the firearm on FELIX-QUIROZ's  
6           behalf.

7           KKK. On or about December 6, 2018, ESPARZA purchased a Glock pistol from  
8           Jones & Jones, an FFL in Somerton, Arizona. To obtain the firearm,  
9           ESPARZA completed a Form 4473 in which he falsely represented that he  
10          was the actual transferee and buyer of the firearm listed on the form, when  
11          in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

12          LLL. On December 8, 2018, LERMA purchased a Glock pistol from Sportsman's  
13          Warehouse, an FFL in Yuma, Arizona. To obtain the firearm, LERMA  
14          completed a Form 4473 in which she falsely certified that she was the actual  
15          transferee and buyer of the firearm listed on the form, when in fact, she  
16          purchased the firearm at PALOMARES's direction and on FELIX-  
17          QUIROZ's behalf.

18          MMM. On December 13, 2018, PALOMARES contacted SANCHEZ VEGA and  
19          asked him to purchase a firearm.

20          NNN. On or about December 15, 2018, GARCIA purchased a Colt pistol from  
21          Jones & Jones, a federally licensed firearms dealer in Somerton, Arizona. To  
22          obtain the firearm, GARCIA completed a Form 4473 in which he falsely  
23          represented that he was the actual transferee and buyer of the firearm listed  
24          on the form, when in fact, he purchased the firearm at FELIX-QUIROZ's or  
25          PALOMARES's direction and on FELIX-QUIROZ's behalf.

26          OOO. On or about December 22, 2018, ESPARZA purchased a Colt rifle from  
27          Jones & Jones, a federally licensed firearms dealer in Somerton, Arizona. To  
28

obtain the firearm, ESPARZA completed a Form 4473 in which he falsely represented that he was the actual transferee and buyer of the firearm listed on the form, when in fact, he purchased the firearm on FELIX-QUIROZ's behalf.

All in violation of Title 18, United States Code, Section 371.

### **COUNTS 2-30**

#### **False Statement During Purchase of a Firearm (18 U.S.C. § 924(a)(1)(A))**

5. Paragraphs 1-4 are incorporated here.

6. On or about the dates listed below, in the District of Arizona, JOSE RODRIGO FELIX-QUIROZ and SERGIO FELIX ESPARZA, JR., knowingly made a false statement and representation to the federal firearms licensee ("FFL") listed below, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the listed FFL, in that ESPARZA did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the firearms indicated on the Form 4473, whereas in truth and in fact, FELIX-QUIROZ was the actual buyer; and to the effect that the residence address provided was his current residence address, whereas in truth and in fact, it was not:

Count	Date	FFL
2	7/10/18	C-A-L Ranch Stores, Yuma, Arizona
3	7/13/18	Jones & Jones, Somerton, Arizona
4	7/17/18	Jones & Jones, Somerton, Arizona
5	7/31/18	Jones & Jones, Somerton, Arizona
6	8/9/18	Jones & Jones, Somerton, Arizona



Count	Date	FFL
7	8/11/18	Jones & Jones, Somerton, Arizona
8	8/18/18	Jones & Jones, Somerton, Arizona
9	8/24/18	Jones & Jones, Somerton, Arizona
10	8/27/18	Jones & Jones, Somerton, Arizona
11	8/30/18	Jones & Jones, Somerton, Arizona
12	9/5/18	C-A-L Ranch Stores, Yuma, Arizona
13	9/11/18	Jones & Jones, Somerton, Arizona
14	9/13/18	C-A-L Ranch Stores, Yuma, Arizona
15	9/13/18	Jones & Jones, Somerton, Arizona
16	9/28/18	Jones & Jones, Somerton, Arizona
17	10/5/18	SuperPawn, Yuma, Arizona
18	10/22/18	Jones & Jones, Somerton, Arizona
19	10/24/18	C-A-L Ranch Stores, Yuma, Arizona
20	10/25/18	Jones & Jones, Somerton, Arizona
21	10/30/18	C-A-L Ranch Stores, Yuma, Arizona
22	11/1/18	Jones & Jones, Somerton, Arizona
23	11/3/18	Jones & Jones, Somerton, Arizona
24	11/10/18	SuperPawn, Yuma, Arizona
25	11/10/18	Jones & Jones, Somerton, Arizona
26	11/13/18	C-A-L Ranch Stores, Yuma, Arizona
27	11/21/18	Jones & Jones, Somerton, Arizona
28	11/30/18	Jones & Jones, Somerton, Arizona
29	12/6/18	Jones & Jones, Somerton, Arizona
30	12/22/18	Jones & Jones, Somerton, Arizona

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

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**COUNT 31**

**False Statement During Purchase of a Firearm  
(18 U.S.C. § 924(a)(1)(A))**

7. Paragraphs 1-4 are incorporated here.

8. On or about November 23, 2018, in the District of Arizona, JOSE RODRIGO FELIX-QUIROZ and RAFAEL PALOMARES, JR., knowingly made a false statement and representation to Sprague's Sports, LLC, Yuma, Arizona, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the listed FFL, in that PALOMARES did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the firearm indicated on the Form 4473, whereas in truth and in fact, FELIX-QUIROZ was the actual buyer.

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

**COUNTS 32-44**

**False Statement During Purchase of a Firearm  
(18 U.S.C. § 924(a)(1)(A))**

9. Paragraphs 1-4 are incorporated here.

10. On or about the dates listed below, in the District of Arizona, JOSE RODRIGO FELIX-QUIROZ and RODRIGO SAMAYOA-VILLAREAL, knowingly made a false statement and representation to the federal firearms licensee ("FFL") listed below, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the listed FFL, in that SAMAYOA-VILLAREAL did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the firearms indicated on the Form 4473, whereas in truth and in fact,

FELIX-QUIROZ was the actual buyer; and to the effect that the residence address provided was his current residence address, whereas in truth and in fact, it was not:

Count	Date	FFL
32	6/16/18	Jones & Jones, Somerton, Arizona
33	8/8/18	C-A-L Ranch Stores, Yuma, Arizona
34	8/22/18	C-A-L Ranch Stores, Yuma, Arizona
35	8/23/18	Jones & Jones, Somerton, Arizona
36	8/29/18	Jones & Jones, Somerton, Arizona
37	9/8/18	C-A-L Ranch Stores, Yuma, Arizona
38	9/12/18	Jones & Jones, Somerton, Arizona
39	9/18/18	Jones & Jones, Somerton, Arizona
40	10/25/18	Jones & Jones, Somerton, Arizona
41	10/30/18	C-A-L Ranch Stores, Yuma, Arizona
42	11/7/18	Jones & Jones, Somerton, Arizona
43	11/16/18	Jones & Jones, Somerton, Arizona
44	12/4/18	C-A-L Ranch Stores, Yuma, Arizona

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

#### **COUNTS 45-47**

#### **False Statement During Purchase of a Firearm (18 U.S.C. § 924(a)(1)(A))**

11. Paragraphs 1-4 are incorporated here.

12. On or about the dates listed below, in the District of Arizona, JOSE RODRIGO FELIX-QUIROZ and ALEJANDRO JIMENEZ GASTELUM, knowingly made a false statement and representation to the federal firearms licensee ("FFL") listed below, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18,

United States Code, to be kept in the records of the listed FFL, in that JIMENEZ GASTELUM did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the firearms indicated on the Form 4473, whereas in truth and in fact, FELIX-QUIROZ was the actual buyer:

Count	Date	FFL
45	11/5/18	C-A-L Ranch Stores, Yuma, Arizona
46	11/30/18	Jones & Jones, Somerton, Arizona
47	12/4/18	Jones & Jones, Somerton, Arizona

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

#### **COUNTS 48-54**

##### **False Statement During Purchase of a Firearm (18 U.S.C. § 924(a)(1)(A))**

13. Paragraphs 1-4 are incorporated here.

14. On or about the dates listed below, in the District of Arizona, JOSE RODRIGO FELIX-QUIROZ, RAFAEL PALOMARES, JR., and DANIEL LANGSTAFF MIRAZO, knowingly made a false statement and representation to the federal firearms licensee ("FFL") listed below, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the listed FFL, in that MIRAZO did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the firearms indicated on the Form 4473, whereas in truth and in fact, FELIX-QUIROZ was the actual buyer:

Count	Date	FFL
48	5/24/18	Sprague's Sports, LLC, Yuma, Arizona
49	7/27/18	Sprague's Sports, LLC, Yuma, Arizona
50	8/1/18	Jones & Jones, Somerton, Arizona
51	8/3/18	Jones & Jones, Somerton, Arizona
52	8/31/18	Sprague's Sports, LLC, Yuma, Arizona
53	9/22/18	Sprague's Sports, LLC, Yuma, Arizona
54	10/3/18	Sprague's Sports, LLC, Yuma, Arizona

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

### COUNTS 55-56

#### **False Statement During Purchase of a Firearm (18 U.S.C. § 924(a)(1)(A))**

15. Paragraphs 1-4 are incorporated here.

16. On or about the dates listed below, in the District of Arizona, JOSE RODRIGO FELIX-QUIROZ, RAFAEL PALOMARES, JR., and MOISES GUADALUPE GARCIA, JR., knowingly made a false statement and representation to the federal firearms licensee ("FFL") listed below, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the listed FFL, in that GARCIA did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the firearms indicated on the Form 4473, whereas in truth and in fact, FELIX-QUIROZ was the actual buyer; and to the effect that the residence address provided was his current residence address, whereas in truth and in fact, it was not:

Count	Date	FFL
55	11/2/18	Jones & Jones, Somerton, Arizona

Count	Date	FFL
56	12/15/18	Jones & Jones, Somerton, Arizona

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

### COUNT 57

#### **False Statement During Purchase of a Firearm (18 U.S.C. § 924(a)(1)(A))**

17. Paragraphs 1-4 are incorporated here.

18. On or about November 29, 2018, in the District of Arizona, JOSE RODRIGO FELIX-QUIROZ, RAFAEL PALOMARES, JR., and JESUS SANCHEZ VEGA, knowingly made a false statement and representation to Sprague's Sports, LLC, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of the listed FFL, in that SANCHEZ VEGA did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the firearm indicated on the Form 4473, whereas in truth and in fact, FELIX-QUIROZ was the actual buyer.

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

### COUNTS 58-59

#### **False Statement During Purchase of a Firearm (18 U.S.C. § 924(a)(1)(A))**

19. Paragraphs 1-4 are incorporated here.

20. On or about the dates listed below, in the District of Arizona, JOSE RODRIGO FELIX-QUIROZ, RAFAEL PALOMARES, JR., and MAILA MARGARITA LERMA, knowingly made a false statement and representation to the federal firearms licensee ("FFL") listed below, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter



44 of Title 18, United States Code, to be kept in the records of the listed FFL, in that LERMA did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that she was the actual buyer of the firearms indicated on the Form 4473, whereas in truth and in fact, FELIX-QUIROZ was the actual buyer:

Count	Date	FFL
58	11/10/18	Elite Ordnance Manufacturers, Phoenix, Arizona
59	12/8/18	Sportsman's Warehouse, Yuma, Arizona

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

#### **COUNT 60**

#### **Possession of Ammunition by Nonimmigrant Alien (18 U.S.C. §§ 922(g)(5)(B))**

21. On or about December 27, 2018, in the District of Arizona, JOSE RODRIGO FELIX-QUIROZ, then being an alien admitted to the United States under a nonimmigrant visa, did knowingly possess in and affecting interstate commerce ammunition, that is: Winchester 7.62 x 51 mm ammunition; Aguila 7.62 x 51 mm ammunition; Federal 7.62 x 51 mm ammunition; American Eagle 7.62 x 51 mm ammunition; American Eagle 5.56 mm ammunition; American Eagle .223 caliber ammunition; Sellier & Bellot .45 caliber ammunition; Magtech .40 caliber ammunition; Remington 9 mm Luger ammunition; Magtech 9 mm Luger ammunition; Aguila 9 mm Luger ammunition; and Fiocchi .38 Superauto caliber ammunition.

In violation of Title 18, United States Code, Sections 922(g)(5)(B) and 924(a)(2).

**COUNT 61**

**Export of Defense Articles without a License  
(22 C.F.R. § 127.1(a)(1) and 22 U.S.C. § 2778(c))**

22. Paragraphs 1-4 are incorporated here.

23. On a date and time unknown to the grand jury, but no earlier than August 27, 2018 and no later than January 15, 2019, in the District of Arizona, the defendants JOSE RODRIGO FELIX-QUIROZ and SERGIO FELIX ESPARZA, JR. knowingly and willfully exported and caused to be exported and attempted to export from the United States to Mexico a defense article, that is one Colt M4, 5.56 millimeter rifle, serial number LE573474, which was designated as a Category I defense article on the United States Munitions List, without having first obtained from the Department of State a license for such export or written authorization for such export.

In violation of Title 22, United States Code, Sections 2778(b)(2) and 2778(c), and Title 22, Code of Federal Regulations, Sections 121.1, 122.1 123.1, 127.1, and 127.3.

**COUNT 62**

**Export of Defense Articles without a License  
(22 C.F.R. § 127.1(a)(1) and 22 U.S.C. § 2778(c))**

24. Paragraphs 1-4 are incorporated here.

25. On a date and time unknown to the grand jury, but no earlier than August 24, 2018 and no later than November 9, 2018, in the District of Arizona, the defendants JOSE RODRIGO FELIX-QUIROZ and SERGIO FELIX ESPARZA, JR. knowingly and willfully exported and caused to be exported and attempted to export from the United States to Mexico a defense article, that is one Colt M4, 5.56 millimeter rifle, serial number CR011901, which was designated as a Category I defense article on the United States Munitions List, without having first obtained from the Department of State a license for such export or written authorization for such export.

In violation of Title 22, United States Code, Sections 2778(b)(2) and 2778(c), and

Title 22, Code of Federal Regulations, Sections 121.1, 122.1 123.1, 127.1, and 127.3.

**COUNT 63**

**Conspiracy to Export Defense Articles without a License  
(22 C.F.R. § 127.1(a)(4) and 22 U.S.C. § 2778(c))**

26. Paragraphs 1-4 are incorporated here.

27. From a time unknown to the Grand Jury, but not later than April 2012, and continuing until at least December 27, 2018, in the District of ARIZONA and elsewhere, the defendants, JOSE RODRIGO FELIX-QUIROZ, SERGIO FELIX ESPARZA, JR., RAFAEL PALOMARES, JR., RODRIGO SAMAYOA-VILLAREAL, DANIEL LANGSTAFF MIRAZO, MOISES GUADALUPE GARCIA, JR., JESUS SANCHEZ VEGA, and MAILA MARGARITA LERMA did knowingly and willfully and intentionally combine, conspire, confederate, and agree with each other and others both known and unknown to the Grand Jury to export, and cause the export from the United States the following defense articles:

- a. Glock Model 17 Gen 5, 9 mm pistol, SN BGFH783
- b. Glock Model 19X, 9 mm pistol, SN BGYV512
- c. Glock Model 19 Gen 5, 9 mm pistol SN BEPB248
- d. Colt Model 02991, .38 Super caliber pistol, SN 2938222
- e. Glock Model 17 Gen 5, 9 mm pistol, SN BGTL393
- f. Glock Model 19X, 9 mm pistol, SN BHNE794
- g. Colt Model LE6920, 5.56 mm rifle, SN LE573709
- h. Colt Model LE6920, 5.56 mm rifle, SN LE575456
- i. Glock Model 17 Gen 5, 9 mm pistol, SN BGEY246
- j. Glock Model 17, 9 mm pistol, SN ADDB889
- k. Glock Model 17 Gen 5, 9 mm pistol, SN BGEY714
- l. Colt Model LE6920-R, 5.56 mm rifle, SN CR011901

- 1 m. Colt Model LE6960CCU, 5.56 mm rifle, SN LE573474
- 2 n. Colt Model LE6920, 5.56 mm rifle, SN LE573300
- 3 o. Glock Model 17 Gen 5, 9 mm pistol, SN BGEY256
- 4 p. Glock Model 42, .380 caliber pistol, SN ACYD737
- 5 q. Glock Model 17, 9 mm pistol, SN BGTS583
- 6 r. Glock Model 17 Gen 5, 9 mm pistol, SN BGTS582
- 7 s. IWI Model Galil Ace, .308 caliber rifle, SN G0011426
- 8 t. Glock Model 17, 9 mm pistol, SN ADDB866
- 9 u. Glock Model 17 Gen 5, 9 mm pistol, SN BGEY255
- 10 v. Colt Model 02991, .38 Super caliber pistol, SN 2938069
- 11 w. Springfield Armory Model XD9, 9 mm pistol, SN GM854503
- 12 x. Colt Model 02071 ELC2, .38 Super caliber pistol, SN ELCEN 11062
- 13 y. Glock Model 19X, 9 mm pistol, SN BHWU143
- 14 z. Glock Model 17 Gen 5, 9 mm pistol, SN BGTF589
- 15 aa. Glock Model 17 Gen 5, 9 mm pistol, SN BGTS581
- 16 bb. Glock Model 19X, 9 mm pistol, SN BHWU144
- 17 cc. Glock Model 17, 9 mm pistol, SN ADDB770
- 18 dd. Colt Model 4540XSE, .38 Super caliber pistol, SN CU06025E
- 19 ee. Century Arms Draco, 7.62 mm pistol, SN DB-8722-18
- 20 ff. Colt Model LE6920-OEM1, 5.56 mm rifle, SN CR212673
- 21 gg. Glock Model 17, 9 mm pistol, SN ADDB736
- 22 hh. Glock Model 19X, 9 mm pistol, SN BKCC872
- 23 ii. Smith & Wesson Model SD9VE, 9 mm pistol, SN FZC7526
- 24 jj. Colt Model LE6920-OEM1, 5.56 mm rifle, SN CR212622
- 25 kk. Barrett Model 82A1, .50 BMG caliber rifle, SN AA007976
- 26 ll. Glock Model 19X pistol, 9 mm pistol, SN BHNE790
- 27 mm. Colt Model 05073GCL, .38 Super caliber pistol, SN GV002083
- 28

- 1 nn. Glock Model 19X, 9 mm pistol, SN BKHK942
- 2 oo. FN Model SCAR 17S, .308 caliber rifle, SN HC62639
- 3 pp. FN Model M249S, 5.56 caliber rifle, SN M249SA07587
- 4 qq. Colt Model 02071ELC21911, .38 Super caliber pistol, SN ELCEN10283
- 5 rr. Colt Model LE6920-OEM1, 5.56 mm rifle, SN CR213112
- 6 ss. Glock Model 17, 9 mm pistol, SN ADDB727
- 7 tt. Colt Model O5073GCL, .38 Super caliber pistol, SN 8V002244
- 8 uu. Glock Model 19X, 9 mm pistol, SN BKHT732
- 9 vv. Colt Model LE6920, 5.56 mm rifle, SN CR008564
- 10 ww. Glock Model 17 Gen 4, 9 mm pistol, SN BBDR050
- 11 xx. Glock Model 17 Gen 4 MOS, 9 mm pistol, SN BFSC773
- 12 yy. Glock Model 17 Gen 4, 9 mm pistol, SN BEGM837
- 13 zz. Century Arms Model L1A1, .308 caliber rifle, SN 100472
- 14 aaa. Glock Model 19 Gen 5, 9 mm pistol, SN BGVA117
- 15 bbb. Colt Model M4, 5.56 mm rifle, SN CR004616
- 16 ccc. IWI Model Galil Ace, .308 caliber rifle, SN G0010135
- 17 ddd. Barrett Model M82A1, .50 BMG caliber rifle, SN AA006943
- 18 eee. Inland Model 1919A4, .308 caliber rifle, SN AZ0014 with a tripod

19 and other defense articles known and unknown to the grand jury which were, at the time  
 20 of the conduct described herein, designated as a defense articles in Category I of the United  
 21 States Munitions List, without having first obtained from the Department of State a license  
 22 for such export or written authorization for such export.

23 In violation of Title 22, United States Code, Sections 2778(b)(2) and 2778(c); and  
 24 Title 22, Code of Federal Regulations, Sections 121.1, 122.1 123.1, 127.1, and 127.3.

25

## 26 **FORFEITURE ALLEGATION**

27 The Grand Jury realleges and incorporates the allegations of Counts 1-64 of this

28



1 Indictment, which are incorporated by reference as though fully set forth herein.

2 Pursuant to Title 18 United States Code, Sections 924(d) and 981, Title 21, United  
3 States Code, Section 853, and Title 28, United States Code, Section 2461(c), and upon  
4 conviction of the offenses alleged in Counts 1-64 of this Indictment, the defendants shall  
5 forfeit to the United States of America all right, title, and interest in (a) any property  
6 constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as  
7 the result of the offense, and (b) any property used, or intended to be used, in any manner  
8 or part, to commit, or to facilitate the commission of such offense, including, but not limited  
9 to the following involved and used in the offense:

- 10 • Glock Model 17 Gen 5, 9 mm pistol, SN BGFH783
- 11 • Glock Model 19X, 9 mm pistol, SN BGYV512
- 12 • Glock Model 19 Gen 5, 9 mm pistol SN BEPB248
- 13 • Colt Model 02991, .38 Super caliber pistol, SN 2938222
- 14 • Glock Model 17 Gen 5, 9 mm pistol, SN BGTL393
- 15 • Glock Model 19X, 9 mm pistol, SN BHNE794
- 16 • Colt Model LE6920, 5.56 mm rifle, SN LE573709
- 17 • Colt Model LE6920, 5.56 mm rifle, SN LE575456
- 18 • Glock Model 17 Gen 5, 9 mm pistol, SN BGEY246
- 19 • Glock Model 17, 9 mm pistol, SN ADDB889
- 20 • Glock Model 17 Gen 5, 9 mm pistol, SN BGEY714
- 21 • Colt Model LE6920-R, 5.56 mm rifle, SN CR011901
- 22 • Colt Model LE6960CCU, 5.56 mm rifle, SN LE573474
- 23 • Colt Model LE6920, 5.56 mm rifle, SN LE573300
- 24 • Glock Model 17 Gen 5, 9 mm pistol, SN BGEY256
- 25 • Glock Model 42, .380 caliber pistol, SN ACYD737
- 26 • Glock Model 17, 9 mm pistol, SN BGTS583
- 27 • Glock Model 17 Gen 5, 9 mm pistol, SN BGTS582

- 1 • IWI Model Galil Ace, .308 caliber rifle, SN G0011426
- 2 • Glock Model 17, 9 mm pistol, SN ADDDB866
- 3 • Glock Model 17 Gen 5, 9 mm pistol, SN BGEY255
- 4 • Colt Model 02991, .38 Super caliber pistol, SN 2938069
- 5 • Springfield Armory Model XD9, 9 mm pistol, SN GM854503
- 6 • Colt Model 02071 ELC2, .38 Super caliber pistol, SN ELCEN 11062
- 7 • Glock Model 19X, 9 mm pistol, SN BHWU143
- 8 • Glock Model 17 Gen 5, 9 mm pistol, SN BGTF589
- 9 • Glock Model 17 Gen 5, 9 mm pistol, SN BGTS581
- 10 • Glock Model 19X, 9 mm pistol, SN BHWU144
- 11 • Glock Model 17, 9 mm pistol, SN ADDDB770
- 12 • Colt Model 4540XSE, .38 Super caliber pistol, SN CU06025E
- 13 • Century Arms Draco, 7.62 mm pistol, SN DB-8722-18
- 14 • Colt Model LE6920-OEM1, 5.56 mm rifle, SN CR212673
- 15 • Glock Model 17, 9 mm pistol, SN ADDDB736
- 16 • Glock Model 19X, 9 mm pistol, SN BKCC872
- 17 • Smith & Wesson Model SD9VE, 9 mm pistol, SN FZC7526
- 18 • Colt Model LE6920-OEM1, 5.56 mm rifle, SN CR212622
- 19 • Barrett Model 82A1, .50 BMG caliber rifle, SN AA007976
- 20 • Glock Model 19X pistol, 9 mm pistol, SN BHNE790
- 21 • Colt Model 05073GCL, .38 Super caliber pistol, SN GV002083
- 22 • Glock Model 19X, 9 mm pistol, SN BKHK942
- 23 • FN Model SCAR 17S, .308 caliber rifle, SN HC62639
- 24 • FN Model M249S, 5.56 caliber rifle, SN M249SA07587
- 25 • Colt Model 02071ELC21911, .38 Super caliber pistol, SN ELCEN10283
- 26 • Colt Model LE6920-OEM1, 5.56 mm rifle, SN CR213112
- 27 • Glock Model 17, 9 mm pistol, SN ADDDB727
- 28

- Colt Model O5073GCL, .38 Super caliber pistol, SN 8V002244
- Glock Model 19X, 9 mm pistol, SN BKHT732
- Colt Model LE6920, 5.56 mm rifle, SN CR008564
- Glock Model 17 Gen 4, 9 mm pistol, SN BBDR050
- Glock Model 17 Gen 4 MOS, 9 mm pistol, SN BFSC773
- Glock Model 17 Gen 4, 9 mm pistol, SN BEGM837
- Century Arms Model L1A1, .308 caliber rifle, SN 100472
- Glock Model 19 Gen 5, 9 mm pistol, SN BGVA117
- Colt Model M4, 5.56 mm rifle, SN CR004616
- IWI Model Galil Ace, .308 caliber rifle, SN G0010135
- Barrett Model M82A1, .50 BMG caliber rifle, SN AA006943
- Inland Model 1919A4, .308 caliber rifle, SN AZ0014 with a tripod
- 500 rounds of Winchester 7.62 x 51 mm ammunition
- 140 rounds of Aguila 7.62 x 51 mm ammunition
- 180 rounds of Federal 7.62 x 51 mm ammunition
- 120 rounds of American Eagle 7.62 x 51 mm ammunition
- 180 rounds of American Eagle 5.56 mm ammunition
- 140 rounds of American Eagle .223 caliber ammunition
- 50 rounds of Sellier & Bellot .45 caliber ammunition
- 250 rounds of Magtech .40 caliber ammunition
- 50 round of Remington brand 9 mm Luger ammunition
- 100 rounds of Magtech brand 9mm Luger ammunition
- 50 rounds Aguila brand 9mm Luger ammunition
- 200 rounds of Fiocchi .38 Superauto caliber ammunition

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (1) cannot be located upon the exercise of due diligence,
- (2) has been transferred or sold to, or deposited with, a third party,
- (3) has been placed beyond the jurisdiction of the court,
- (4) has been substantially diminished in value, or
- (5) has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of said defendant(s) up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

All in accordance with Title 18, United States Code, Sections 924(d) and 981, Title 21, United States Code, Section 853, Title 28, United States Code, Section 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

A TRUE BILL

/S/  
FOREPERSON OF THE GRAND JURY  
Date: April 30, 2019

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